

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. : **DATE FILED** _____

DOUGLAS MILNIK : **VIOLATION: 18 U.S.C. § 1341**
(mail fraud -
1 Count)
18 U.S.C. § 2
(aiding and abetting)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to this information:

1. On or about August 21, 2002, defendant DOUGLAS MILNIK applied for and obtained in the name of Allied Paper Products a Post Office Box with the United States Postal Service, that is, Post Office Box 11537, Philadelphia, Pennsylvania 19116.
2. On or about April 2, 2003, defendant DOUGLAS MILNIK applied for and obtained in the name of Douglas Milnik a Post Office Box with the United States Postal Service, that is, Post Office Box 11596, Philadelphia, Pennsylvania 19116.
3. Defendant DOUGLAS MILNIK owned and operated a business named Allied Paper Products, P.O. Box 11596, Philadelphia, Pennsylvania 19116.
4. Defendant DOUGLAS MILNIK owned and operated a business named Penn Paper Products, P.O. Box 11537, Philadelphia, Pennsylvania 19116.

THE SCHEME

5. From in or about July, 2003 to in or about April, 2004, defendant

DOUGLAS MILNIK

devised and intended to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

It was part of the scheme that:

6. Defendant Douglas Milnik mailed false and fraudulent invoices in the United States mail under the names of Allied Paper Products, P.O. Box 11596, Philadelphia, PA 19116 and Penn Paper Products, P.O. Box 11537, Philadelphia, PA 19116 to businesses at numerous addresses throughout the United States falsely stating an amount due and owing for “HD Cleaner” and “Abrasive Paper,” when the businesses to whom the defendant mailed the invoices did not have an amount due and owing for any products to the defendant DOUGLAS MILNIK, and to any of his companies, including Allied Paper Products and Penn Paper Products, because the businesses had not ordered “HD Cleaner” or “Abrasive Paper” and Allied Paper Products and Penn Paper Products had not shipped and never shipped “HD Cleaner” and “Abrasive Paper” to any businesses.

7. Between on or about July 21, 2003 and on or about January 13, 2004, defendant DOUGLAS MILNIK mailed and caused to be mailed approximately 30 false and fraudulent invoices in the United States mail under the name of Allied Paper Products, P.O. Box 11596, Philadelphia, PA 19116 to businesses at numerous addresses throughout the United States stating various amounts due and owing for “HD Cleaner” and “Abrasive Paper.”

8. Between on or about July 21, 2003 to on or about January 13, 2004, defendant

DOUGLAS MILNIK caused to be mailed approximately six separate checks totaling approximately \$2,076.83 in the United States mail from businesses at various addresses throughout the United States to Allied Paper Products, P.O.Box 11596, Philadelphia, PA 19116 in payment of the false and fraudulent invoices.

9. Between on or about November 28, 2003 and on or about April 15, 2004, defendant DOUGLAS MILNIK mailed and caused to be mailed approximately 27 false and fraudulent invoices in the United States mail under the name of Penn Paper Products, P.O. Box 11537, Philadelphia, PA 19116 to businesses at numerous addresses throughout the United States stating various amounts due and owing for “HD Cleaner” and “Abrasive Paper.”

10. Between on or about November 28, 2003 and on or about April 15, 2004, defendant DOUGLAS MILNIK caused to be mailed approximately one check totaling approximately \$408.91 in the United States mail from a business to Penn Paper Products, P.O. Box 11537, Philadelphia, PA 19116 in payment of a false and fraudulent invoice.

11. Between in or about July, 2003 and in or about April, 2004, defendant DOUGLAS MILNIK cashed the checks received in payment of the false and fraudulent invoices with a check cashing agency in the Eastern District of Pennsylvania totaling approximately \$2,485.74.

12. On or about December 23, 2003, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

DOUGLAS MILNIK,

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to be delivered by mail according to the directions thereon, a check from Owl Wire &

Cable, Inc., Canastota, New York in the amount of \$408.91 in payment of a false and fraudulent invoice to Penn Paper Products, P.O. Box 11537, Philadelphia, PA 19116.

In violation of Title 18, United States Code, Sections 1341 and 2.

PATRICK L. MEEHAN
United States Attorney